May 3, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554
VIA ELECTRONIC DELIVERY

Re: Comment

ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Ms. Dortch:

On behalf of the over 7,500 US employees of NXP Semiconductors USA, diligently working to bring safer transportation technology to America's roadways, we respectfully request the Federal Communication Commission's consideration of the following points.

Estimates by the United States Department of Transportation show that 40,000 lives were lost on America's roads last year, with many others being irreversibly impaired because of motor vehicle accidents. Independent assessments suggest that the number of casualties far surpasses the government's findings. Regardless of the statistics, it is an irrefutable fact that much remains to be done to reduce the high number of auto collisions. Absent any meaningful action, the rate of injuries and deaths is likely to rise, especially in view of the ongoing problem of distracted driving.

Both the Safety Spectrum Coalition and the Coalition for Safety Sooner, representing a consortium of industry stakeholders and a group of state departments of transportation, have appealed to the US government for the preservation and accelerated utilization of DSRC in the 5.850-5.925 GHz band allocated to Intelligent Transportation Systems for safety critical, life-saving transportation applications.

DSRC is uniquely configured to enable continuous, low latency, and secure data exchanges between vehicles and the roadway infrastructure to support safety-critical applications. Connected Vehicle technologies based on DSRC have the potential to provide benefits including increasing mobility, reducing crashes, and most importantly saving lives. V2X is the only ADAS sensor technology that sees around corners, in real time. DSRC communications technology is ready to deploy and has been rigorously tested to prove efficacy. In 2017, NXP helped to deploy

over 16000 DSRC-based RSUs and OBUs in the 31 US Smart city deployment projects. NXP has been shipping DSRC chips to GM since 2017 for standard line-fit to their 2017 Cadillac CTS car production for the North America market. The recent announcement by Toyota on near-term fleet-wide deployment will soon bring DSRC within reach of even more and drivers.

It is inarguable that the American way of life is inextricably linked to transportation. The ability to radically transform vehicular transportation in a way to make it safer to drivers, passengers, and vulnerable road users and pedestrians is at hand. NXP opposes any change to the band allocated for ITS in North America and hopes that reasoned consideration of the benefits of DSRC will lead to a requirement that any new technology be backwards compatible and complementary to DSRC. Lives are being lost, and a broader deployment of DSRC can reverse this trend.

/s/Peter J. Esser
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